

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JESSICA HICKLIN,

Plaintiff,

v.

ANNE PRECYTHE,

et al.,

Defendants.

Case No. 4:16-CV-01357-NCC

**REQUEST FOR STATUS CONFERENCE**

On May 22, 2018, the Court entered a Permanent Injunction stating, in part, “For as long as Ms. Hicklin remains in the custody of MDOC, Defendants shall provide Ms. Hicklin with care that her doctors deem medically necessary treatment for her gender dysphoria, including hormone therapy, permanent hair removal, and access to gender-affirming canteen items,” *see* Dkt. 176.

The parties now dispute the scope of that injunction. Ms. Hicklin and the MDOC Defendants have attempted to resolve this issue among themselves and have thus far been unable to do so, and thus anticipate needing to resolve this issue through motion practice before the Court.

For these reasons, Ms. Hicklin and the MDOC Defendants respectfully request a status conference with the Court to take place on the morning of May 6, 2021, or otherwise at the Court’s convenience, to ascertain the Court’s schedule for briefing this issue.

Respectfully submitted this 4<sup>th</sup> day of May, 2021.

s/ Rajin S. Olson

Richard Saenz\*  
Lambda Legal Defense &  
Education Fund, Inc.  
120 Wall Street, Floor 19  
New York, NY 10005  
Tel: 212-809-8585  
Fax: 212-809-0055  
rsaenz@lambdalegal.org

Kara Ingelhart\*

Lambda Legal Defense &  
Education Fund, Inc.  
65 E. Wacker Pl., Suite 2000  
Chicago, IL 60601  
Tel 312-663-4413, ext. 4328  
Fax 312-663-4307  
kingelhart@lambdalegal.org

Rajin S. Olson\*

Robins Kaplan LLP  
800 LaSalle Avenue  
2800 LaSalle Plaza  
Minneapolis, MN 55402  
Tel: 612-349-8500  
Fax: 612-339-4181  
rolson@robinskaplan.com

Kevin L. Schriener, #35490MO

Law & Schriener, LLC  
141 N. Meramec Avenue  
Suite 314  
St. Louis, MO 63105  
Tel: (314) 721-7095  
Fax: (314) 863-7096  
kschriener@schrienerlaw.com

Attorneys for Plaintiff Jessica Hicklin

*\*Admitted pro hac vice*

s/ Jeremiah J. Morgan

Jeremiah J. Morgan, Mo. Bar #50387  
Robert Schaeffer, Mo. Bar #69324  
Assistant Attorneys General  
Missouri Attorney General's Office  
P.O. Box 861  
St. Louis, MO 63188  
Tel: 314-340-7652  
jeremiah.morgan@ago.mo.gov  
robert.schaeffer@ago.mo.gov

Attorneys for Defendants Anne Precythe,  
Dwayne Kempker, Ian Wallace, Cindy  
Griffith, Stan Payne, Scott O'Kelly, and  
Deloise Williams